

EXHIBIT 79

HIGHLY CONFIDENTIAL

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3
4 THOMSON REUTERS ENTERPRISE

5 CENTRE GMBH and WEST PUBLISHING

6 CORPORATION,

7 Plaintiffs/Counterdefendants,

8 vs.

Case No.

9 ROSS INTELLIGENCE INC.,

C.A. No. 20-613-LPS

10 Defendant/Counterclaimant.

11
12 ** HIGHLY CONFIDENTIAL **

13
14 VIDEOTAPED DEPOSITION OF ERIK LINDBERG

15 Tuesday, March 22, 2022

16 9:00 a.m. (Central)

17
18 PLACE: Veritext Legal Solutions

19 150 South Fifth Street

20 Suite 1775

21 Minneapolis, Minnesota

22
23 Reported By:

24 Christine K. Herman, RPR, CRR

25 JOB No. 5129633

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFFS/COUNTERDEFENDANTS
AND THE WITNESS

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ALSO PRESENT: Dave Young, Videographer

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1 P R O C E E D I N G S

2

3 THE VIDEOGRAPHER: Good morning. We're
4 going on the record at 9:07 a.m. on March 22nd,
5 2022.

6 Please note that the microphones are
7 sensitive and may pick up whispering, private
8 conversations or cellular interference. Please turn
9 off all cell phones and place them away from the
10 microphones, because they can interfere with the
11 deposition audio.

12 Audio and video recording will continue to
13 take place unless all parties agree to go off the
14 record.

15 This is Media Unit 1 of the video-recorded
16 deposition of Erik Lindberg, taken by counsel for
17 the defendants, in the matter of Thomson Reuters
18 Enterprise Centre GmbH and West Publishing
19 Corporation vs. ROSS Intelligence Incorporated, Case
20 No. 20-613-LPS.

21 This case is filed in the United States
22 District Court, For the District of Delaware. This
23 deposition is happening at the offices of Veritext
24 in Minneapolis.

25 My name is Dave Young. I'm the

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1 videographer. Our court reporter is Christine
2 Herman. We are both representing Veritext Legal
3 Solutions.

4 I am not related to any party in this
5 action, nor am I financially interested in the
6 outcome

7 Counsel will now state their appearances
8 and affiliations for the record. If there are any
9 objections to this proceeding, please state them at
10 the time of your appearance, beginning with the
11 noticing attorney.

12 MR. STEINBERG: Joachim Steinberg from
13 Crowell & Moring on behalf of Defendant, ROSS
14 Intelligence Incorporated.

15 MR. CANTER: Jacob Canter from Crowell &
16 Moring on behalf of defendant, ROSS Intelligence
17 Incorporated.

18 MR. SIMMONS: My name is Joshua Simmons.
19 With me is Eric Loverro. We are from Kirkland &
20 Ellis. We are representing the plaintiffs in this
21 matter, as well as the witness.

22 THE VIDEOGRAPHER: Will the court reporter
23 please swear in the witness, and then we can
24 proceed.

25 Whereupon,

1 ERIK LINDBERG,
2 a witness in the above-entitled matter,
3 after having been first duly sworn,
4 deposes and says as follows:

5 EXAMINATION

6 BY MR. STEINBERG:

7 Q. Good morning, Mr. Lindberg. As you heard
8 a second ago, I'm an attorney for the defendant in
9 this matter.

10 A little bit of housekeeping to get
11 started. Could you please state your full name for
12 the record.

13 A. Erik Marcus Lindberg.

14 Q. Have you ever been deposed before?

15 A. I have not.

16 Q. All right. So I'm going to go through a
17 few just basic rules so we're all on the same page.
18 We need audible answers here today. The court
19 reporter can't take down nods, uh-huhs, things like
20 that.

21 Do you understand?

22 A. Yes.

23 Q. You're doing a very good job of that so
24 far, but I may remind you of that from time to time
25 today.

Page 8

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Abstract The purpose of this study was to determine whether there were differences in the prevalence of

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15 JULY 2004

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[REDACTED]

1. *Journal of Management Studies*, 1997, 34, 1, 1-14.

1. *Journal of Management Studies*, 1996, 33, 1, 1-14.

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CERTIFICATE

Be it known that I took the deposition of
ERIK LINDBERG on the 22nd day of March, 2022;

That I was then and there a Notary Public
in and for the County of Anoka, State of
Minnesota, and that by virtue thereof, I was duly
authorized to administer an oath;

That the witness, before testifying, was
by me first duly sworn to testify the whole truth
and nothing but the truth relative to said cause;

That the testimony of said witness was
recorded in shorthand by me and was reduced to
typewriting under my direction;

That the cost of the original transcript
has been charged to the party noticing the
deposition, unless otherwise agreed upon by Counsel,
and that copies have been made available to all
parties at the same cost, unless otherwise agreed
upon by Counsel;

That I am not related to any of the parties
hereto nor interested in the outcome of the action;

That the reading and signing of the
deposition by the witness and the Notice of Filing
were reserved.

WITNESS MY HAND AND SEAL this 5th day of
April, 2022.



Christine K. Herman, RPR, CRR

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE CENTRE
GMBH and WEST PUBLISHING
CORPORATION,

C.A. No. 20-613-LPS

Plaintiffs, Counterdefendants,

v.

ROSS INTELLIGENCE INC.,

Defendant, Counterclaimant.

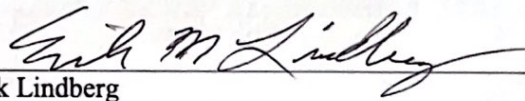
**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTER GMBH
AND WEST PUBLISHING CORPORATION'S NOTICE OF ERRATA
FOR THE DEPOSITION OF ERIK LINDBERG**

I, the undersigned, do hereby declare that I read the deposition transcript of Erik Lindberg dated March 22, 2022 and that to the best of my knowledge, said testimony is true and accurate, with the exception of the following changes listed below:

Page	Line	Original Text	Replacement Text	Reason
8	13	"Erik Marcus Lindberg"	"Erik Markus Lindberg"	Transcription error
16	3	"superior account manager"	"supervisor account manager"	Transcription error
16	24	"Josh and Erik"	"Josh and Eric"	Transcription error
36	4-5	"Essa Fraz at Thomson Reuters"	"Fraz Essa at Thomson Reuters"	Transcription error
42	8	"saw major issue"	"saw a major issue"	Transcription error
42	14	"internal learning processes"	"internal alerting processes"	Transcription error
47	7	"preparation for this email (sic)"	"preparation for this deposition"	Transcription error
58	11	"retailer pro forma rates"	"retail or pro forma rates"	Transcription error
75	19-20	"the print reporter system, national reporter system that print reporter books"	"the print reporter system, or the national reporter system that is the print reporter books"	Transcription error

Page	Line	Original Text	Replacement Text	Reason
76	4	"key number system, all of our reported"	"key number system, for all of our reported"	Transcription error
80	5	"to memo"	"to memos"	Transcription error
86	13	"very long opinion text"	"very long opinion texts"	Transcription error
117	13	"surfaced up through key sites"	"surfaced up through KeyCite"	Transcription error
126	19	"document data type, or the DDT"	"document type definition, or the DTD"	Transcription error
130	8	"editors assign to that same key number"	"editors assigned to that same key number"	Transcription error
130	21	"notes and decisions"	"notes of decisions"	Transcription error
133	14	"whoever altered the memo"	"whoever authored the memo"	Transcription error
133	22	"whoever altered this memo"	"whoever authored this memo"	Transcription error
145	12	"expecting to"	"expecting it to"	Transcription error
161	1	"with the Westlaw"	"with Westlaw"	Transcription error
166	10	"earlier today, market ad was leading"	"earlier today, Mark Haddad was leading"	Transcription error
188	12	"saw major issue"	"saw a major issue"	Transcription error
190	4	"referring. You can refer to"	"referring to. You can refer to"	Transcription error
203	11	"This case within a Westlaw cite"	"This case with a Westlaw cite"	Transcription error

Dated: April 29, 2022


Erik Lindberg